

1 Honorable Christopher M. Alston
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8 IN THE UNITED STATES BANKRUPTCY COURT FOR THE
9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

10 In re:) Chapter 7
11 JACK CARLTON CRAMER JR.,) Bankruptcy No. 18-13383
12 Debtor(s).) STIPULATED MOTION FOR AN
13 _____) ORDER DECLARING DEED OF
14) TRUST UNENFORCEABLE

15 COME NOW 21st Mortgage Corporation (“21st Mortgage”), through counsel, Tomasi Salyer
16 Martin, and Eleanor A. DuBay, and the duly appointed trustee, Edmund J. Wood, through counsel,
17 The Livesey Law Firm, and Rory C. Livesey, and stipulate as follows:

18 21st Mortgage is the beneficiary of that deed of trust dated December 22, 2000, and recorded
19 in the records of King County, Washington on December 28, 2000, under recording number
20001228001193 against the real property of the estate located at 15605 - 63rd Avenue N.E.,
Kenmore, Washington 98028, and legally described as

21 Lot 1 in Block 3 of Inglewoods No. 2, as per plat recorded in Volume 54 of Plats,
Pages 30 and 31, Records of King County Auditor;

22 Situate in the City of Kenmore, County of King, State of Washington.

23 21st Mortgage and the trustee stipulate that the obligation secured by that deed of trust is
24 unenforceable due to the passage of time and the deed of trust is not an encumbrance against the
25 property.

**STIPULATED MOTION FOR AN
ORDER DECLARING DEED
OF TRUST UNENFORCEABLE**
200406aMot Page 1

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1 This stipulation does not affect the judgment in favor of 21st Mortgage filed under recording
2 number 20160802000179, and as set forth in Proof of Claim No. 4 filed in this proceeding, the
3 allowance and payment of which will be subject to further order of the court.

4 RESPECTFULLY SUBMITTED this 8th day of April, 2020.

5 TOMASI SALYER MARTIN

/S/ *Eleanor A. DuBay*

9 RESPECTFULLY SUBMITTED this 8th day of April, 2020.

10 THE LIVESEY LAW FIRM

/S/ *Rory C. Livesey*

13 **Rory C. Livesey, WSBA #17601**
Attorney for Edmund J. Wood, Trustee

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